

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

PATRICK BRADY, *et al.*,

Plaintiffs,

v.

AIR LINE PILOTS ASSOCIATION.

Defendant.

Civil Acton No. 02-2917 (JEI)

**DECLARATION OF LISA J. RODRIGUEZ IN SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANT'S MOTION FOR SUMMARY JUDGMENT**

I, Lisa J. Rodriguez, certify as follows:

1. I am a partner with the law firm Schnader Harrison Segal & Lewis LLP, co-Class Counsel for Plaintiffs in this certified class action. I submit this Declaration in Support of Plaintiffs' Opposition to Defendant's Motion for Summary Judgment. I am fully familiar with the facts set forth herein.

2. Attached hereto as **Exhibit A** is a true and correct copy of a video prepared by ALPA describing the "Rightful Place" Proposal. Also attached is a transcript of the video.

3. Attached hereto as **Exhibit B** is a true and correct copy of *In the Matter of Arbitration between American Airlines v. Allied Pilots Association*, Opinion (July 22, 2013).

4. Attached hereto as **Exhibit C** is a true and correct copy of the Post Hearing Brief of the TWA Pilots Committee, *American Airlines, Inc. v. Allied Pilots Association* (June 15, 2013).

5. Attached hereto as **Exhibit D** is a true and correct copy of Letter of Agreement (12-05) dated January 1, 2013.

6. Attached hereto as **Exhibit E** is a true and correct copy of the expert report of Katia P. Sycara dated March 15, 2013.

7. Attached hereto as **Exhibit F** is a true and correct copy of excerpts of the deposition transcript of Katia P. Sycara dated April 5, 2103.

8. Attached hereto as **Exhibit G** is a true and correct copy of excerpts of the trial testimony of Michael Day dated June 23, 2011.

9. Attached hereto as **Exhibit H** is a true and correct copy of excerpts of the deposition transcript of Roland Wilder dated August 8, 2008.

I hereby certify that the following statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: September 30, 2013

s/ Lisa J. Rodriguez
Lisa J. Rodriguez